

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

JAMES PARK, CATHERINE RAMOS,
GEOFFREY ADAMSON and
MICHAEL KUZMIAK,

Plaintiffs,

v.

SHINHAN FINANCIAL GROUP CO., LTD.,
SHINHAN BANK CO., LTD.,
SHINHAN BANK AMERICA,
JIN OK-DONG, JI YOUNG YOOK,
CHARLES CONSTANTIN, JUNG JI HO,
KANG SHIN TAE, DANIEL E. FRYE,
DAE-KI MIN, WALTER O'MEARA,
RYAN PAK, and LEE SOON YOO,

Defendants.

Case No. 22-cv-10331
(VSB)(KHP)

NOTICE OF MOTION TO DISMISS

PLEASE TAKE NOTICE THAT, Defendants Shinhan Bank America, Charles Constantin, Daniel E. Frye, Walter O'Meara, Dae-Ki Min, Ryan Pak, and Ji Young Yook, by and through their undersigned counsel, Paul, Weiss, Rifkind, Wharton & Garrison LLP, hereby move to dismiss with prejudice all causes of action in the Amended Complaint filed on February 8, 2023 as asserted against them, pursuant to Federal Rules of Civil Procedure 12(b)(1) and 12(b)(6) and upon the accompanying Memorandum of Law.

Dated: June 8, 2023
New York, New York

Respectfully submitted,

PAUL, WEISS, RIFKIND, WHARTON &
GARRISON LLP

By: /s/ Liza M. Velazquez

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Ji Young Yook*